

## **EXHIBIT B**

1  
2 UNITED STATES DISTRICT COURT

3 SOUTHERN DISTRICT OF NEW YORK

4 Civil Action No. 12 cv 8812 (CM/JCF)

5 -----x

6 LEENA VARUGHESE, M.D.,

7 Plaintiff,

8 - against -

9 MOUNT SINAI MEDICAL CENTER, PATRICK LENTO,

10 M.D., CARLOS CORDON-CARDO, M.D., ADOLFO

11 FIRPO, M.D., IRA J. BLEIWEISS, M.D. and

12 ABC Corp. 1-10, and JOHN DOES 1-10,

13 Defendants.

14 -----x

15 October 25, 2013

16 10:00 a.m.

17  
18 Deposition of PATRICK LENTO, M.D.,  
19 taken by the Plaintiff, held at the office  
20 of Ronald J. Wronko, LLC, 315 Madison  
21 Avenue, New York, New York, before Joseph  
22 Ravenell, a Court Reporter and Notary  
23 Public of the State of New York.

24  
25 Job No. NJ1755404

1 PATRICK LENTO, M.D.

2 letter that "We will meet again in three  
3 months to review your progress."

4 Q. Prior to meeting with  
5 Dr. Varughese to review her progress, had  
6 you been apprised of the fact that  
7 Dr. Varughese had made an allegation to  
8 human resources that she was the victim of  
9 gender discrimination?

10 A. Not at that point, no.

11 Q. At what point did you become  
12 aware of that?

13 A. I think it was maybe in April or  
14 May.

15 Q. How did you become aware of it?

16 A. I don't recall who informed me.

17 Q. Do you know whether Caryn  
18 Tiger-Paillex informed you?

19 A. I don't remember who informed  
20 me.

21 Q. Did you receive notification at  
22 the same time that she had alleged that  
23 she was being retaliated against?

24 A. Did I receive a notification?

25 Q. Did you become aware of the fact

1                   PATRICK LENTO, M.D.  
2       just by engaging in questions.

3           Q.       But after the pleasantries,  
4       isn't it fair to say that you immediately  
5       began engaging in questions?

6           A.       Right. So the purpose of the  
7       meeting was to follow up, as was outlined  
8       in the academic advisement. Based on, as  
9       I mentioned, the academic advisement, we  
10      discussed it.

11          Q.       Was it really a discussion or  
12      you asking her questions and trying to pin  
13      her down to establish that she had not  
14      done what you wanted with regard to the  
15      self-reflection and had not read the book?

16                 MR. McEVOY: Objection to the  
17      form. You can answer.

18          A.       I had indicated to Dr. Varughese  
19      that I didn't think the academic  
20      advisement had met the criteria that we  
21      had outlined and discussed regarding  
22      academic advisement.

23          Q.       Had you thought that it was  
24      unprofessional for Dr. Varughese to have  
25      made allegations that she was the victim

1 PATRICK LENTO, M.D.

2 of gender discrimination?

3 A. Inappropriate? No.

4 Q. Unprofessional?

5 A. Why would that be unprofessional?

6 MR. McEVOY: No, you are being  
7 asked the question.

8 A. No.

9 Q. Following the meeting, were you  
10 made aware by Dr. Cordon-Cardo that  
11 Dr. Varughese had reiterated her complaint  
12 that she was the victim of gender  
13 discrimination and retaliation?

14 A. I don't recall that.

15 Q. When you first became aware that  
16 Dr. Varughese had made the allegation of  
17 gender discrimination, did you do anything  
18 to institute an investigation into that  
19 particular allegation or to follow up with  
20 anyone?

21 A. That would not have been my  
22 responsibility.

23 Q. Why wouldn't it have been your  
24 responsibility upon learning that, to  
25 ensure that Mount Sinai's anti-discrimination